



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

4/13/2016

Certified Mail

Mr. Mike Yoder
ProVia Walnut Creek Facility
2150 State Route 39
Sugar creek, OH 44681

Facility ID: 0238000159
Permit Number: P0119939
County: Holmes

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 - Via E-Mail Notification
Ohio EPA-NEDO

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Initial

ProVia Walnut Creek Facility

2150 State Route 39, , Sugarcreek, OH 44681

ID#: P0119939

Date of Action: 4/13/2016

PermitDesc: Initial Title V permit for a door manufacturing facility..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Andrew Marantides, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



Statement of Basis
 ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0238000159
Facility Name:	ProVia Walnut Creek Facility
Facility Description:	Door manufacturing facility
Facility Address:	2150 State Route 39, Sugarcreek, OH 44681
Permit #:	P0119939, Initial
<p>This facility is subject to Title V because it is major for:</p> <p> <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV </p>	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit	N/A



Statement of Basis
 ProVia Walnut Creek Facility
Permit Number: P0119939
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document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.4.		40 CFR Part 63 Subpart HHHHHH	The facility may be subject to the area source MACT (GACT) rule (the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) that Ohio EPA does not have delegated authority to implement. Instead, U.S. EPA has the authority to enforce this standard. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule.

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID	R = record keeping requirements
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ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)	Rp = reporting requirements
OR = operational restriction	ET = emission testing requirements (not including compliance method terms)
M = monitoring requirements	St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?	Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
R003-R009, R011-R016	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.	17-07(A)		N	N	N	N	N	N	Y	N	N	ET – Compliance with the stacks’ visible particulate emissions limitations shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
R003-R009, R011-R016	The PE from the natural gas-fired ovens shall not exceed 0.020 pound per million Btu of actual heat input	17-10(B)		N	N	N	N	N	N	Y	N	N	ET – Compliance with the PE rate may be based upon the following estimation method: $PE(lb/mmBtu) = EF/(Btu/cf)$ where EF (7.6 lbs per mmcf per AP-42 Table 1.4-2) and $Btu/cf = 1050$ (per applications), so actual PE rate is 0.0072 lb/mmBtu.
R003-R009, R011-R016	None	17-11(C)		N	Y	N	N	Y	Y	N	N	N	OR – must operate dry filtration systems for control of particulate emissions whenever these emissions units are in operation, and expeditiously repair when not operating according to manufacturer’s recommendations, instructions or manual(s). R – Document manufacturer’s recommendations, instructions or manual(s); conduct periodic and annual inspections; maintain a record of maintenance performed; and document all times the dry filtration systems were not in service when emissions units were operating. Rp – submit quarterly deviation reports for each day that a dry particulate system was not in service or operated according to manufacturer recommendations when emissions units operated.



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R009	R009 shall not employ more than ten gallons of coating per day for metal parts.	21-09(U)(2)(e)(iii)		Y	N	N	N	Y	Y	Y	N	N	ND – The 10 gallon/day restriction shall not include coatings applied to parts that are not metal. R – Keep daily records of gallons of each coating used and parts coated (metal or nonmetal). Rp – Identify each day more than 10 gallons/day were used on metal parts on R009. ET – Compliance demonstrated by recordkeeping requirements.
R003-R009, R011-R016	VOC content shall not exceed a certain pounds per gallon of coating (varies by emissions unit), as a daily volume weighted average, excluding water and exempt solvents. The permittee shall only burn natural gas in the drying ovens associated with these emissions units.	31-05(A)(3) and ORC 3704.03(T)		N	Y	Y	N	Y	Y	Y	N	N	OR – Only burn natural gas. M – If burning a fuel other than natural gas, record the type and quantity of fuel burned. R – Record daily VOC content as applied for each emissions unit. Rp – Submit deviation reports within 45 days after an exceedance of allowable daily volume-weighted average VOC content whenever parts are coated. ET – Compliance shall be based upon the estimation specified in OAC rule 3745-21-10(B)(9) for C _{VOC,2} .
R003-R009, R011-R016	None.	31-05(A)(3)(a)(ii)		Y	N	N	N	N	N	N	N	N	ND – The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE rate and the emissions of PM ₁₀ , SO ₂ , CO and NO _x from these air contaminant sources since the calculated annual emissions rates are less than 10 tons per year, once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.



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R003-R009, R011-R016	VOC emissions shall not exceed certain tons per year (varies by emissions unit), based upon rolling 12-month summations of monthly emissions. Coating usage shall not exceed certain gallons per year (varies by emissions unit) based upon rolling 12-month summations of coating usage figures.	31-05(D)		N	Y	N	N	Y	Y	Y	N	N	OR – follow monthly coatings usage levels for the first 12 months of operation for emissions units R014 – R016. R – maintain monthly records of VOC emissions rates in tons, rolling 12-month summations of VOC emissions, monthly OC emissions rates in tons, coating usage for each month in tons and the rolling 12-month summation of the coating usage in gallons (for each emissions unit). Rp – submit quarterly deviation reports including all exceedances of the rolling 12-month emission limitation for VOC in tons and all exceedances of the rolling 12-month limitation on coating usage in gallons (for each emissions unit), including probable causes, durations, and corrective actions taken. ET – Compliance based upon the record keeping requirements specified in d)(8) and d)(8)d. for these emissions units.
R003-R009, R011-R016	None.	114-01	ORC 3704.03(F)	Y	N	N	N	N	N	N	N	N	ND – Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” was not necessary because individual maximum annual emissions for each air toxic contaminant will be less than 1.0 ton per year, but a new PTI would be required if material changes cause an increase to above 1.0 ton per year.
P002-P004	Visible particulate emissions shall not exceed 0% opacity as a 6-minute average. The PE rate shall not exceed 0.01 gr/dscf.	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	M – Perform daily visible emissions checks. R – Perform daily visible emissions checks and document any visible emissions incidents. Rp – Submit quarterly deviation reports. ET – If required, performance of Method 9 VE readings; if required, performance of Methods 1-5, 40 CFR Part 60, Appendix A.



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P008-P010	PE shall be controlled by a baghouse with 99% control efficiency for P008, a cyclone with 98% control efficiency for P009 and a fabric filter with 99% control efficiency for P010.	31-05(F)		N	Y	N	N	Y	Y	Y	N	N	OR – PE shall be vented to control equipment when operating. R – Daily records when processes are not vented to control equipment; install, operate and maintain control equipment and monitor pressure drop according to manufacturer’s specifications, along with documentation of maintenance and any deviations. RP – submit quarterly deviation reports. ET – If required, performance of Methods 1-5, 40 CFR Part 60, Appendix A.
P008-P010	None	31-05(A)(3)		Y	N	N	N	N	N	N	N	N	ND – the emissions limitations established pursuant to this rule (BAT) are equivalent the emissions limitations established pursuant to OAC rule 3745-31-05(F).
P002-P004, P008-P010	None	31-05(A)(3)(a)(ii)		Y	N	N	N	N	N	N	N	N	ND – the BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from these air contaminant sources since the calculated annual emissions rates are less than 10 tons per year, once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
P002-P004, P008-P010	None	17-07(A)		Y	N	N	N	N	N	N	N	N	ND – In accordance with OAC rule 3745-17-07(A)(3)(h), these EUs are exempt from the visible particulate emission limitations.
P002-P004, P008-P010	None	17-07(B)(1)		Y	N	N	N	N	N	N	N	N	ND – In accordance with OAC rule 3745-17-07(B)(11)(d), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08(B).
P002-P004, P008-P010	None	17-08(B)		Y	N	N	N	N	N	N	N	N	ND – The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08(A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08(B).
P002-P004, P008-P010	None	17-11		Y	N	N	N	N	N	N	N	N	ND – Uncontrolled PE is less than 10 lbs/hr for P002-P004 and cannot be ascertained for P008-P010, so Figure II of OAC rule 3745-17-11 does not apply. Process weight rates cannot be ascertained, so these EUs are exempt from Table I requirements per OAC rule 3745-17-11(A)(2)(b)(i).



DRAFT

**Division of Air Pollution Control
Title V Permit
for
ProVia Walnut Creek Facility**

Facility ID:	0238000159
Permit Number:	P0119939
Permit Type:	Initial
Issued:	4/13/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
ProVia Walnut Creek Facility

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Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238000159
Facility Description: Door manufacturing facility
Application Number(s): A0054075, A0055336
Permit Number: P0119939
Permit Description: Initial Title V permit for a door manufacturing facility.
Permit Type: Initial
Issue Date: 4/13/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 44681

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms

and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart HHHHHH: R003, R004, R005, R006, R007, R008, R009, R011, R012, R013, R014, R015 and R016. The complete GACT requirements including the GACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

[Authority for term: 40 CFR Part 63, Subpart HHHHHH]

3. The following insignificant emissions units are located at this facility:

P001 – Door assembly with a rigid polyurethane foam process no. 1 (PTI # P0104759)

P005 – Door assembly with a rigid polyurethane foam process no. 2 (PTI # P0112531)

P006 – 575 HP diesel-fired emergency electrical generator (PBR11512)

P007 – 200 HP diesel-fired emergency electrical generator (PBR11513)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed above are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63.

[Authority for term: OAC rule 3745-77-07(A)(13)]



Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group – Spray booths w/natural gas ovens: R003, R004, R005, R006, R007, R008, R009, R011, R012, R013, R014, R015, R016

EU ID	Operations, Property and/or Equipment Description
R003	Automated spray coating of metal and fiberglass doors with a 0.5 mmBtu/hr. natural gas-fired drying oven and an auxiliary 0.5 mmBtu/hr. natural gas-fired drying oven.
R004	Manual spray coating of metal and fiberglass doors with a 0.5 mmBtu/hr. natural gas-fired drying oven and an auxiliary 0.5 mmBtu/hr. natural gas-fired drying oven.
R005	Manual coating of metal, fiberglass and wood parts with a 0.5 mmBtu/hr. natural gas-fired drying oven and an auxiliary 0.5 mmBtu/hr. natural gas-fired drying oven.
R006	Spray coating of metal and fiberglass parts with a 0.4 mmBtu/hr. natural gas-fired drying oven.
R007	Manual spray coating of metal, fiberglass and plastic parts and trim with a 0.75 mmBtu/hr. natural gas fired drying oven.
R008	Spray coating of metal and fiberglass doors with a 1.0 mmBtu/hr. natural gas-fired drying oven.
R009	Spray coating of metal and fiberglass parts with a 0.75 mmBtu/hr. natural gas-fired drying oven.
R011	Conveyorized spray coating of wood door jambs with a 0.16 mmBtu/hr. natural gas-fired drying oven.
R012	Manual spray coating of wood door jambs with a 0.16 mmBtu/hr. natural gas-fired drying oven.
R013	Automatic spray coating of fiberglass, metal and plastic doors, windows and trim with a 0.75 mmBtu/hr. natural gas-fired drying oven.
R014	Primer spray booth with a 0.4 MMBtu/hr natural gas-fired oven.
R015	Top coat spray booth 1 with a 1.0 MMBtu/hr natural gas-fired oven.
R016	Top coat spray booth 2 with a 1.0 MMBtu/hr natural gas-fired oven.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)i. and d)(9).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from the drying oven stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-10(B)	The particulate emissions (PE) from the natural gas-fired dryers shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-17-111	See c)(2), c)(3) and d)(2) – d)(6).
d.	OAC rule 3745-21-09(U)(1)(d)	<p>For EUs R003 – R005, R007 – R008, R013, R015 and R016, the emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and ORC 3704.03(T). See b)(2)a.</p> <p>For EUs R006 and R014, the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and ORC 3704.03(T). See b)(2)a.</p> <p>For EU R009, the emission limitation specified by this rule does not apply. See b)(1)e.</p> <p>For Eus R011 and R012, the emission limitation specified by this rule does not apply because no metal parts are coated.</p>
e.	OAC rule 3745-21-09(U)(2)l(iii)	See b)(2)(f).
f.	<p>OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)</p> <p>(PTIs P0018497, P0118880, P0118498 and P0120249)</p>	<p>See b)(2)a., b)(2)b. and c)(1).</p> <p>The PE limitation from the coating operations established pursuant to this rule is equivalent to the requirements established pursuant to OAC rule 3745-17-111.</p>
g.	<p>OAC rule 3745-31-05(A)(3)(a)(ii)</p> <p>(PTIs P0018497, P0118880, P0118498 and P0120249)</p>	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE rate and the emissions of particulate matter less than or equal to 10 microns in diameter (PM₁₀), sulfur dioxide (SO₂), carbon monoxide (CO) and nitrogen oxides (NO_x) from these air contaminant sources since their potentials to emit are less than 10 tons per year.</p> <p>See b)(2)c.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Prevention of Significant Deterioration Rules Applicability (PTIs P0118497 and P0118498)	For EUs R006 and R014, VOC content shall not exceed 2.3 pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents. This emission limitation is more stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and ORC 3704.03(T). See b)(2)d., b)(2)e., d)(8) and e)(5).
i.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(9).
j.	40 CFR Part 63, Subpart HHHHHH (40 CFR 63.11169 – 11180)	See c)(5), d)(10) and e)(6).
k.	40 CFR 63.1 – 16 (40 CFR 63.11174)	Table 1 to Subpart HHHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHHH shows which parts of the General Provisions in 40 CFR 63.1 – 16 apply.

(2) Additional Terms and Conditions

- a. The volatile organic compound (VOC) content for coating parts shall not exceed the limits, in pounds per gallons of coating, as a daily volume-weighted average, excluding water and exempt solvents as noted in the following table:

Maximum allowable:

Emissions Unit ID	Metal Substrates	Nonmetal Substrates
R003	3.5	3.5
R004	3.5	3.5
R005	3.5	3.5
R006	2.3	2.3
R007	3.5	3.5
R008	3.5	3.5
R009	5.3	5.3
R011	N/A	5.92
R012	N/A	5.92
R013	3.5	3.5
R014	2.3	2.3



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Emissions Unit ID	Metal Substrates	Nonmetal Substrates
R015	3.5	3.5
R016	3.5	3.5

- b. The BAT requirement specified in b)(1)d. and c)(1) for the PE rate and the emissions of SO₂, CO and NO_x from the natural gas-fired dryers applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP.
- d. The emissions of VOC from the coating and cleanup operations from these emissions units shall not exceed the limits, in tons per year, based upon rolling 12-month summations of the monthly emissions from the coating and cleanup operations as noted in the following table:

Maximum allowable:

Emissions Unit ID	VOC Emissions, Tons
R003	17.72
R004	15.31
R005	11.51
R006	14.66
R007	13.78
R008	29.53
R009	7.95
R011	31.08
R012	4.44
R013	21.46
R014	14.66
R015	29.53
R016	17.72

- e. The maximum annual coating usages for these emissions units shall not exceed the limits, in gallons per year, based upon rolling 12-month summations of coating usage figures as noted in the following table:

Maximum allowable:



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Emissions Unit ID	Coating Usage, Gallons
R003	10,125
R004	8,750
R005	6,575
R006	12,750
R007	7,875
R008	16,875
R009	3,000
R011	10,500
R012	1,500
R013	12,250
R014	12,750
R015	16,875
R016	10,125

f. For emissions unit R009, the permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in the drying ovens associated with these emissions units.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall operate the dry filtration systems for the control of particulate emissions whenever these emissions units are in operation and shall maintain the dry particulate filters in accordance with the manufacturer’s recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249, OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

(3) In the event a particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions or operating manual(s), with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(A)(1)]



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	R014 Maximum Allowable Cumulative Coating Usage (Gallons)	R015 Maximum Allowable Cumulative Coating Usage (Gallons)	R016 Maximum Allowable Cumulative Coating Usage (Gallons)



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	1,062	1,406	843
	2,125	2,812	1,687
	3,187	4,218	2,531
	4,250	5,625	3,375
	5,312	7,031	4,218
	6,375	8,437	5,062
	7,437	9,843	5,906
	8,500	11,250	6,750
	9,562	12,656	7,593
	10,625	14,062	8,437
	11,687	15,468	9,281



	12,750	16,875	10,125
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[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0120149]

- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

63.11173(a)	management practices to minimize evaporative MeCl emissions
63.11173(b)	develop and implement a written MeCl minimization plan, if required
63.11173(e)	operational requirements
63.11173(f)	personnel training program
63.11173(g)	personnel training dates

[Authority for term: 40 CFR Part 63, Subpart HHHHHH]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions or operating manuals for the dry particulate filters, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall conduct periodic inspections of the dry particulate filters to determine whether they are operating in accordance with the manufacturer's recommendations, instructions or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a

copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (4) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filters while the associated emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter systems and shall maintain the following information:
- a. the emissions unit ID number;
 - b. the date of the inspection;
 - c. a description of each/any problem identified and the date it was corrected;
 - d. a description of any maintenance and repairs performed; and
 - e. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall maintain records that document any time periods when the dry particulate filters were not in service when the associated emissions unit was in operation, as well as a record of all operations during which the dry particulate filters were not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall collect and record the following information each day for each emissions unit:
- a. the name and identification number of each coating and each cleanup material, as applied;

- b. the organic compound (OC) content of each cleanup material employed, in pounds per gallon, excluding water;
- c. the type of substrate (metal or nonmetal) that each coating is applied to;
- d. the mass of VOC per volume of each coating and each cleanup material, excluding water and exempt solvents, as applied;
- e. the net volume of each coating and each cleanup material, excluding water and exempt solvents, as applied; and
- f. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall maintain monthly records of the following information for each emissions unit:
- a. the VOC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;
 - b. the rolling, 12-month summation of the VOC emissions;
 - c. the OC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;
 - d. the coating usage for each month, in gallons; and
 - e. the rolling, 12-month summation of the coating usage, in gallons.

These monthly records shall also be maintained for the purpose of determining the annual emissions for each emissions unit.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (9) Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute,” ORC 3704.03(F)(4)(b), was not necessary because these emissions units’ individual maximum annual emissions for each air toxic contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249 and OAC rule 3745-77-07(C)(1)]

- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart HHHHHH, including the following sections:

63.11173(c)	maintain copies of annual usage of paint strippers containing MeCl
63.11173(d)	maintain copy of MeCl minimization plan, if required
63.11177(a)	painter training certification
63.11177(b)	filter efficiency documentation
63.11177(c)	spray gun transfer efficiency documentation
63.11177(d)	copies of notifications and reports submitted
63.11177(e)	records of paint strippers containing MeCl used
63.11177(f)	record of MeCl minimization plan, if required
63.11177(g)	records of any deviations
63.11177(h)	records of assessments of source compliance
63.11178(a)	records maintenance and retention

[Authority for term: 40 CFR Part 63, Subpart HHHHHH]

- (11) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0118498: d)(1) – d)(9), Permit To Install # P0118497: d)(1) – d)(8), Permit To Install # P0118880: d)(1) – d)(9) and Permit To Install # P0120249: d)(1) – d)(8). The monitoring and record keeping requirements contained in the above-referenced Permits to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permits to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emissions units. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249, OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(2)a. whenever parts are coated. Each report shall be submitted within 45 days after the exceedance occurs.

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249, OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a daily record showing that R009 employs more than the applicable maximum daily coating usage limit of ten gallons per day specified in b)(2)f. whenever metal parts and products are coated. Each report shall include a copy of such record and shall be submitted within 45 days after the exceedance occurs.

[Authority for term: PTI P0118497 and OAC rule 3745-21-09(U)(2)(e)(iii)]

- (4) Unless other arrangements have been approved by the Director (the Northeast District Office), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify for these emissions units:

- a. an identification of each day when a daily record showing that a dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the associated emissions unit was in operation;
- b. an identification of each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(2)a. whenever parts are coated;
- c. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC; and
 - ii. all exceedances of the rolling, 12-month limitation on coating usage;



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- d. the probable cause of each deviation (excursion);
- e. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- f. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June) and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

[Authority for term: PTIs P0018497, P0118880, P0118498, P0120249, OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

- (6) The permittee shall submit notifications and reports to the Ohio EPA Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart HHHHHH, per the following sections:

63.11175(a)	Initial Notification
63.11175(b)	Notification of Compliance Status
63.11176(a)	Annual Notification of Changes Report
63.11176(b)	MeCl minimization plan report, if required

[Authority for term: 40 CFR Part 63, Subpart HHHHHH]

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0118498: e)(1) – e)(4), Permit To Install # P0118497: e)(1) – e)(4), Permit To Install # P0118880: e)(1) – e)(3) and Permit To Install # P0120249: e)(1) – e)(3). The reporting requirements contained in the above-referenced Permits to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permits to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible PE from the drying oven stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the stacks' visible particulate emissions limitations shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-07(A) PTIs P0018497, P0118880, P0118498 and P0120249]

b. Emission Limitation:

The PE from the natural gas-fired dryers shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance may be based on the following estimation method:

$$PE(\text{lb/mmBtu}) = EF/(\text{Btu/cf})$$

Where:

PE(lb/mmBtu) = the PE rate, which is estimated to be 0.0072 pound of PE-PM₁₀ per million Btu actual heat input;

EF = emissions factor, which is 7.6 lbs. PE-PM₁₀ per million cubic foot of natural gas fuel flow per AP-42 Table 1.4-2. Chapter 1.4 (July, 1998); and

Btu/cf = factor to convert heat input to cubic foot of natural gas fuel flow, which is 1050 Btu/cf as specified in the applications.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-10(B) PTIs P0018497, P0118880, P0118498 and P0120249]

c. Emission Limitation:

The VOC content for coating parts shall not exceed the limits, in pounds per gallons of coating, as a daily volume-weighted average, excluding water and exempt solvents as noted in the following table:



Maximum allowable:

Emissions Unit ID	Metal Substrates	Nonmetal Substrates
R003	3.5	3.5
R004	3.5	3.5
R005	3.5	3.5
R006	2.3	2.3
R007	3.5	3.5
R008	3.5	3.5
R009	5.3	5.3
R011	N/A	5.92
R012	N/A	5.92
R013	3.5	3.5
R014	2.3	2.3
R015	3.5	3.5
R016	3.5	3.5

Applicable Compliance Method:

Compliance shall be based on the following estimation method(s):

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n [(C_{VOC,2i} L_{Ci}) (V_{Si} + V_{VOCi})]}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ = the daily volume-weighted average VOC content of all coatings, as applied, as specified in OAC rule 3745-21-10(B)(9).

$C_{VOC,2}$ = the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC}).$$

D_C = the density of a coating, in pounds of coating per gallon of coating.

W_{VOC} = the weight fraction of VOC in a coating = $W_{VM} - W_W - W_{ES}$.

W_{VM} = the weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = the weight fraction of water in coating, in pound of water per pound of coating.

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W_{ES} = the weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

V_{VOC} = the volume fraction of VOC in a coating. = $V_{VM} - V_W - V_{ES}$.

V_{VM} = the volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = the volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = the volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = a subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = the liquid volume of coating employed during time period t, in gallons of coating.

M_C = the mass of coating employed during the time period t, in pounds of coating.

i = a subscript denoting a specific coating employed during time period t.

n = the total number of coatings employed during time period t.

t = the time period specified for the weighted average VOC content is per day and not included in the calculation.

For an alternative compliance method request, the permittee shall submit a written request and receive approval from the Ohio EPA Northeast District Office before an alternative method, not listed above, may be used for the VOC content determination.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3) PTIs P0018497, P0118880, P0118498 and P0120249]

d. Emission Limitation:

The emissions of VOC from the coating and cleanup operations from these emissions units shall not exceed the limits, in tons per year, based upon rolling 12-month summations of the monthly emissions from the coating and cleanup operations as noted in the following table:



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Maximum allowable:

Emissions Unit ID	VOC Emissions, Tons
R003	17.72
R004	15.31
R005	11.51
R006	14.66
R007	13.78
R008	29.53
R009	7.95
R011	31.08
R012	4.44
R013	21.46
R014	14.66
R015	29.53
R016	17.72

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(8) for these emissions units.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D) PTIs P0018497, P0118880, P0118498 and P0120249]

e. Coating Usage Limitation:

The maximum annual coating usages for these emissions units shall not exceed the limits, in gallons per year, based upon rolling 12-month summations of coating usage figures as noted in the following table:

Maximum allowable:

Emissions Unit ID	Coating Usage, Gallons
R003	10,125
R004	8,750
R005	6,575
R006	12,750
R007	7,875



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Emissions Unit ID	Coating Usage, Gallons
R008	16,875
R009	3,000
R011	10,500
R012	1,500
R013	12,250
R014	12,750
R015	16,875
R016	10,125

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(8)d. for these emissions units.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D) PTIs P0018497, P0118880, P0118498 and P0120249]

f. Daily Usage Limitation:

For emissions unit R009, the permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(7)e. for R009.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-21-09(U)(2)(e)(iii) and PTI P0118497]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # P0118498: f)(1), Permit To Install # P0118497: f)(1), Permit To Install # P0118880: f)(1) and Permit to Install # P0120249: f)(1). The testing requirements contained in the above-referenced Permits to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permits to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with control equipment for VOC emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0018497, P0118880, P0118498 and P0120249]

- (2) Potential VOC emissions are generated from the coating operations and natural gas-fired drying ovens combined, and were estimated at the following levels:

Emissions Unit ID	Potential VOC Emissions in Tons Per Year
R003	17.72
R004	15.31
R005	11.51
R006	14.66
R007	13.78
R008	29.53
R009	7.95
R011	31.08
R012	4.44
R013	21.46
R014	14.66
R015	29.53
R016	17.72

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0018497, P0118880, P0118498 and P0120249]

- (3) These emissions units will not coat wood furniture are therefore are not subject to the requirements of OAC rule 3745-21-15 nor to the requirements of 40 CFR Part 63 Subpart JJ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations (40 CFR 63.800 – 63.808 and associated tables).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0018497, P0118880, P0118498 and P0120249]



Draft Title V Permit
ProVia Walnut Creek Facility
Permit Number: P0119939
Facility ID: 0238000159

Effective Date: To be entered upon final issuance

- (4) These emissions units at this facility are located in Holmes County and not in any county identified in OAC rule 3745-21-24(A)(1) and are therefore not subject to the requirements of OAC rule 3745-21-24 for coating of flat wood paneling.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0018497, P0118880, P0118498 and P0120249]

- (5) The ProVia Walnut Creek Facility is an area (minor) source of hazardous air pollutant (HAP) emissions. This source is not subject to the NESHAP for the Surface Coating of Wood Building Products (40 CFR 63.4680 – 63.4781 and associated tables).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTIs P0018497, P0118880, P0118498 and P0120249]

2. Emissions Unit Group - Wood & plastic working operations: P002, P003, P004, P008, P009, P010

EU ID	Operations, Property and/or Equipment Description
P002	Woodworking mill no. 1: 27 woodworking machines each of which are vented to a Donaldson-Toritbaghouse to control particulate emissions (PE); and enclosed wood waste transfer from the baghouse to a truck trailer. Exhaust air from the wood waste collection trailer is returned to the Donaldson-Toritbaghouse.
P003	Wood & plastic mill no. 2: 3 woodworking and plastic working machines each of which are vented to a Dantherm S-1000 baghouse to control particulate emissions.
P004	Wood & plastic mill no. 3: 2 woodworking and plastic working machines each of which are vented to a Donaldson-Torit cyclone to control particulate emissions.
P008	Signet Line wood/plastic parts machining controlled by a Dantherm S-1000 5000 cfm fabric filter exhausting indoors.
P009	Signet Door Line wood/plastic machining controlled by a Donaldson/Torit 30-15HP 5600 cfm cyclone exhausting indoors.
P010	Five steel door line sanding tables each equipped with a 4500 cfm Donaldson dust collector.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001 (PTI P0111731)	For emissions units P002 – P004: The visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average, from the stacks serving these emissions units. The PE rate shall not exceed 0.01 grains per dry standard cubic foot (grains/dscf), from the stacks serving these emissions units. See b)(2)a.
b.	OAC rule 3745-31-05(F) (PTI P0119863)	For emissions units P008 – P010: Particulate emissions (PE) shall be



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		controlled by a baghouse providing a control efficiency of 99% for P008, a cyclone collector providing a control efficiency of 98% for P009 and a fabric filter dust collector providing a control efficiency of 99% for P010.
c.	OAC rule 3745-31-05(A)(3) June 30, 2008 (PTI P0119863)	For emissions units P008 – P010, the emissions limitations established pursuant to this rule is equivalent to the emissions limitations established pursuant to OAC rule 3745-31-05(F). See b)(2)a.
d.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 (PTIs P0111731 and P0119863)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from these air contaminant sources since the calculated annual emissions rates are less than 10 tons per year. See b)(2)b.
e.	OAC rule 3745-17-07(A)	Exempt. See b)(2)c.
f.	OAC rule 3745-17-07(B)(1)	Exempt. See b)(2)d.
g.	OAC rule 3745-17-08(B)	Exempt. See b)(2)e.
h.	OAC rule 3745-17-11	See b)(2)f. and b)(2)g.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. In accordance with OAC rule 3745-17-07(A)(3)(h), these emissions units are exempt from the visible particulate emission limitations.
- d. In accordance with OAC rule 3745-17-07(B)(11)(d), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08(B).



e. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08(A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08(B).

f. For emissions units P002 – P004: OAC rule 3745-17-11, Figure II, which is in the State Implementation Plan, does not have an allowable PE rate if the uncontrolled PE rate is less than 10 lbs/hr.

For emissions units P008 – P010: The uncontrolled emissions rate for these emissions units is not able to be ascertained, and therefore, in accordance with OAC rule 3745-17-11(A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.

g. The process weight rates for these emissions units cannot be ascertained. They are exempt from Table I requirements, per OAC rule 3745-17-11(A)(2)(b)(i).

c) Operational Restrictions

(1) Particulate emissions from these emissions units shall be vented to baghouses and/or cyclones at all times when the emissions units are in operation.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(A)(1)]

(2) The baghouses and/or cyclones shall be operated with sufficient volumetric flow rates to eliminate visible particulate emissions at the points of capture to the extent possible with good engineering design.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when any equipment associated with these emissions units are in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stacks, the permittee shall also note the following in the operations log:

a. Whether the baghouses and/or cyclones were exhausted to the ambient air or not;

b. the location of the emissions;

c. the color of the emissions;

d. whether the emissions are representative of normal operations;

e. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

f. the total duration of any visible emissions incident; and

- g. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall record on a daily basis every period of time (start time and date, and end time and date) when the processes associated with these emissions units were in operation and the process emissions were not vented to the baghouses and/or cyclones.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouses and/or cyclones when any equipment associated with these emissions units are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouses and/or cyclones on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation;
- e. the findings and recommendations; and
- f. whether the baghouses and/or cyclones were exhausted to the ambient air or not.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- g. a description of the corrective action;
- h. the date corrective action was completed;
- i. the date and time the deviation ended;
- j. the total period of time (in minutes) during which there was a deviation;
- k. the pressure drop readings immediately after the corrective action was implemented; and
- l. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This ranges or limits on the pressure drop across the baghouses and/or cyclones are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limits or ranges for the pressure drops based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain records of maintenance conducted on the baghouses and/or cyclones along with the associated manufacturer's recommendations.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0111731, issued on 3/1/2013: d)(1) – d)(4) and Permit to Install # P0119863, issued on 12/10/2015: d)(1) – d)(4). The monitoring and record keeping requirements contained in the above-referenced Permits to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permits to Install.

[Authority for term: PTI P0111731, PTI P0119863 and OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include a log of the downtime for the capture (collection) systems, control devices, and any monitoring equipment, when the associated emissions units were in operation.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June) and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall submit semiannual reports that identify:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions;
 - c. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - e. each incident of deviation described in "a" above where a prompt investigation was not conducted;
 - f. each incident of deviation described in "a" above where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

These reports shall be submitted, electronically through Ohio EPA Air Services, by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) Unless other arrangements have been approved by the Director (the Northeast District Office), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # P0111731, issued on 3/1/2013: e)(1) and Permit to Install # P0119863, issued on 12/10/2015: e)(1). The reporting requirements contained in the above-referenced

Permits to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permits to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the stacks associated with emissions units P002 – P004 shall not exceed 0% opacity as a six-minute average, in accordance with the BAT requirements specified in b)(1)a. authorized by OAC rule 3745-31-05(A)(3) as effective 11/30/2001.

Applicable Compliance Method:

If required, compliance with the stacks' visible PE limitation(s) shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3) PTI P011731]

b. Emission Limitation:

The PE rate shall not exceed 0.01 grains/dscf from emissions units P002 – P004.

Applicable Compliance Method:

Compliance may be determined by the following equation(s):

$$\text{Concentration}_{\text{PE}} = \text{EF} \times (1 - \text{CE}) \text{ (grain PE/dscf)} / \text{(grain PE}_{\text{UNCTRL}}/\text{dscf)}.$$

Where:

Concentration_{PE}= the mass concentration of particulate emissions in the baghouse or cyclone exhaust gas, which was estimated to be 0.00056 grain PE/dscf for P002, 0.0005 grain PE/dscf for P003 and 0.0010 grain PE/dscf for P004.

EF= uncontrolled PE rate generated from woodworking operations, which is assumed to be 0.05 grain PE_{UNCTRL}/dscf for a woodworking process, determined from a source test in the South Coast Air Quality Management District (SCAQMD), California.



Effective Date: To be entered upon final issuance

CE= control efficiency of the air pollution control equipment, which is 99% for P002's baghouse, 99% for P003's baghouse and 98% for P004's cyclone, as noted in previous applications.

If required, compliance with the PE limitation above shall be determined according to Method 1 – 5, 40 CFR 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3) PTI P011731]

c. Emission Limitation:

Particulate emissions (PE) shall be controlled by a baghouse providing a control efficiency of 99% for P008, a cyclone collector providing a control efficiency of 98% for P009 and a fabric filter dust collector providing a control efficiency of 99% for P010.

Applicable Compliance Method:

- i. If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
- ii. Annual particulate emissions from P008 – P010 were determined using the following equation:

$$E = (Em)(FR)(60 \text{ min/hr})(1 \text{ lb}/7,000 \text{ grain})(8760 \text{ hrs/yr})(1 \text{ ton}/2000 \text{ lbs})(1-CE)$$

Where:

E = annual particulate emission rate, in tons per year;

Em = 0.05 grain per cubic foot of particulate emission rate, uncontrolled emission factor cited in instructions to the permit application forms published by the San Joaquin Valley Unified APC District (Guideline for Expedited Application Review – Woodworking Operations);

FR = flow rate in cubic feet per minute (5,000 cfm for P008, 5,600 cfm for P009 and 4,500 cfm for P010; and

CE = percent particulate emitted after CE control equipment (0.99 for P008, 0.98 for P009 and 0.99 for P010).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3) PTI P0119863]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0111731, issued on 3/1/2013: f(1) and Permit to Install P0119863, issued on



12/10/2015: f)(1). The testing requirements contained in the above-referenced Permits to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permits to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) The exhaust gases from the control devices associated with emissions units P002, P003 and P004 may be vented indoors, as noted in their applications.

[Authority for term: PTI P0111731 OAC rule 3745-77-07(C)(1)]